

INTERVENTION

BEFORE THE ARIZONA CORPORATION COMMISSION
AZ CORP COMMISSION



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CARL J. KUNASEK
Chairman

JUL 30 4 25 PM '99

JIM IRVIN
Commissioner

ORIGINAL

DOCUMENT CONTROL

WILLIAM A. MUNDELL
Commissioner

IN THE MATTER OF U S WEST
COMMUNICATION, INC.'S COMPLIANCE)
WITH SECTION 271 OF THE TELE-)
COMMUNICATIONS ACT OF 1996)

DOCKET NO. T-00000A-97-0238
APPLICATION FOR LEAVE TO
INTERVENE

Pursuant to A.A.C. R14-3-105, Cable Plus Company, LP, doing business in

Arizona as Telephone Plus (hereinafter, "Telephone Plus" or the "Company") hereby petitions the
Arizona Corporation Commission ("Commission") for its order granting leave to intervene in the
above-captioned proceeding to determine the compliance of U S WEST Communications, Inc. ("U
S WEST") with Section 271 of the Telecommunications Act of 1996 (the "Section 271
Proceeding"). This Application is based upon the following:

1. Telephone Plus has applications pending before this Commission to provide
competitive resold and facilities-based local and long distance telecommunications services within
the State of Arizona, and the Company is currently providing resale local exchange services to
customers in the Phoenix and Tucson metropolitan areas. Telephone Plus resells the
telecommunications services of U S WEST, and the Company's planned facilities-based network
will interconnect with U S WEST's network in the not distant future. Thus, Telephone Plus has a
direct and substantial interest in the Section 271 Proceeding.

2. Telephone Plus' participation in the Section 271 Proceeding will not unduly
broaden the issues presented. Telephone Plus does not intend to revisit any issues previously

Arizona Corporation Commission

DOCKETED

JUL 30 1999

DOCKETED BY

[Signature]

Snell & Wilmer

L.L.P.

LAW OFFICES

One Arizona Center
Phoenix, AZ 85004-0001
(602) 382-6000

Crooked\PHX\667688.01

1 addressed and resolved in this docket, but seeks only to participate in the discussion and resolution
2 of those remaining issues pertaining to U S WEST's compliance with Section 271. As a
3 competitive provider which purchases telecommunications services from U S WEST, the
4 Company has important insight relevant to this proceeding.

5 3. Telephone Plus is entitled to intervene in this proceeding pursuant to A.A.C.
6 R14-3-105.

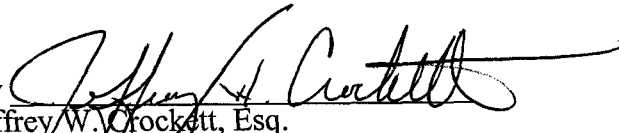
7 4. The name, address and telephone number of the person upon whom service
8 of all documents is to be made is:

9 Jeffrey W. Crockett
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16 WHEREFORE, Cable Plus Company, L.P., doing business as Telephone Plus,
17 respectfully requests that it be granted intervention in the above-captioned proceeding.

18 DATED this 30th day of July, 1999.

19 SNELL & WILMER

20 By 
21 Jeffrey W. Crockett, Esq.
22 One Arizona Center
23 Phoenix, Arizona 85004-0001
24 Attorneys for Cable Plus Company, LP, doing
25 business as Telephone Plus

26 ORIGINAL AND TEN (10) copies
filed this 30th day of July, 1999, with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

1 COPIES mailed this 30th day
2 of July, 1999, to individuals on the
3 attached mailing list.

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1 SERVICE LIST FOR:

U S WEST COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 FILING

2
3 DOCKET NO.

T-00000A-97-0238

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